

Board Evidence Pack

Acme Capital Partners Ltd

This document constitutes a board evidence pack under the Crime and Policing Act 2026, Section 250. That section makes a body corporate or partnership criminally liable where a "senior manager" — defined in s.250(3) as an individual who plays "a significant role in (a) the making of decisions about how the whole or a substantial part of the activities of the body corporate or partnership are to be managed or organised, or (b) the managing or organising of the whole or a substantial part of those activities" — commits an offence under the law of England and Wales, Scotland, or Northern Ireland (any criminal offence, not limited to financial-services offences) within the actual or apparent scope of their authority. This pack documents the AI-assisted identification of individuals at Acme Capital Partners Ltd who meet this functional definition and are not covered by an FCA Senior Management Function, the human compliance officer review decisions, and the declaration programme audit trail. All AI classifications required human confirmation before inclusion. Generated by CoverProof on 2026-05-26.

Pack generated: 2026-05-26T14:00:00.000Z UTC · Generated 35 days before the Section 250 statutory deadline (29 June 2026)

Firm Details

Firm Name: Acme Capital Partners Ltd
FCA FRN: 123456

Section 250 Gap Summary

| | | | |
|--------------------------------|----------------------------|---------------------------|---------------------------|
| Total Individuals 45 | SM&CR Covered 28 | Exposed (AI) 12 | Confirmed Gap 5 |
|--------------------------------|----------------------------|---------------------------|---------------------------|

"Confirmed Gap" = individuals with status=confirmed and High/Medium AI classification not covered by SM&CR — the legally significant exposure count under Section 250.

Gap Individuals — Classification Rationale & Reasoning

HUMAN REVIEW GATE: All classifications below have been individually reviewed and confirmed by a qualified compliance officer before inclusion in this pack. AI-generated classifications that are not confirmed are excluded. The compliance officer's confirmation is the operative record; the AI output is evidence of the analytical basis.

Scope-Discovery Affirmation

Before AI classification ran, the compliance officer affirmed under the scope-discovery gate (scope-gate-v1) that the uploaded register covered the firm's full senior-manager population, not just FCA-approved staff. The affirmation forms part of this pack's audit trail.

Affirmed by user: sarah.chen@example.test

Affirmed at: 2026-05-25T12:30:00.000Z UTC

Affirmation ID: 00000000-0000-0000-0000-000000000099

Categories confirmed in scope:

- All individuals approved under SMF1–SMF29 for the firm
- All certified persons and relevant Conduct Rules staff
- All unregistered senior employees with material decision authority (Head-of, acting/interim executives, individuals with material budget or trading authority)
- All individuals at group / parent / subsidiary entities who exercise material influence over this firm's regulated activities

Compliance officer notes — individuals considered but excluded:

Considered the interim contract CTO and excluded after confirming no budget authority. Reviewed all SMF holders and certified employees against the s.250(3) functional test.

AI Classification Methodology Statement

Model: claude-sonnet-4-6 (Anthropic) · Methodology: s250-v12 · Temperature: 0 (deterministic)

Statutory basis: Crime and Policing Act 2026, s.250(3) — verbatim definition of "senior manager"

Two independent judgments per individual:

S.250 STATUS (statute-only): Likely / Possibly / Unlikely — whether the person plays a significant role in managing or organising a substantial part of activities under s.250(3).

GOVERNANCE COVERAGE (SM&CR layer): Full SMF / Partial / None — independent of the s.250 verdict.

Gap tier (High / Medium / Low) is derived from the cross product:

HIGH — Likely + None (functional test met, no SMF coverage — catastrophic gap).

MEDIUM — Likely + Partial, or Possibly + Partial/None (review required).

LOW — Likely + Full SMF (covered), Possibly + Full SMF, or Unlikely + None (out of scope).

Confidence tiers: High Confidence (80+) · Moderate Confidence (55–79) · Low Confidence — Review Required (<55)

The s.250(3) functional test is decided by a court on the facts; SM&CR coverage is a distinct question. A gap tier is a reasoned screening inference from the distance between the two — not a legal determination that the individual is caught by s.250.

Every classification is provisional until confirmed by a qualified compliance officer. AI assists; it does not replace the responsible officer's judgement.

| Timestamp (UTC) | Activity |
|--------------------------|-----------------------------|
| 2026-05-20T09:00:00.000Z | SM&CR register imported |
| 2026-05-20T09:05:00.000Z | Gap analysis triggered |
| 2026-05-21T10:00:00.000Z | Declaration cycle triggered |

Audit Log Extract

Scope: declaration lifecycle events only (email_sent, link_accessed, form_viewed, submitted). Excludes firm events (imports, logins, billing).

| Timestamp (UTC) | Individual | Event |
|--------------------------|------------------|---------------------------|
| 2026-05-21T09:00:00.000Z | James Harrington | declaration.email_sent |
| 2026-05-22T10:15:00.000Z | James Harrington | declaration.link_accessed |
| 2026-05-22T10:30:00.000Z | James Harrington | declaration.submitted |
| 2026-05-21T09:01:00.000Z | Priya Sharma | declaration.email_sent |
| 2026-05-21T09:02:00.000Z | Oliver Bennett | declaration.email_sent |
| 2026-05-23T11:00:00.000Z | Oliver Bennett | declaration.submitted |

Generation Metadata

Generated at: 2026-05-26T14:00:00.000Z UTC
 Firm: Acme Capital Partners Ltd (FRN: 123456)
 Confirmed gap individuals: 3
 Generator: CoverProof Evidence Pack Generator v1
 Standard: Crime and Policing Act 2026, Section 250

SHA-256 tamper-detection hash is stored in the CoverProof audit database at generation time and is not embedded in this document (circular dependency prevents in-document hashing). The hash verifies the byte-for-byte integrity of this file.

Business-records certificate (Civil Evidence Act 1995, s.9(2))

To be completed and signed by an officer of the firm. CoverProof renders this form; the statement below is the firm officer's, not CoverProof's.

I, _____ (name), _____ (role / position) of Acme Capital Partners Ltd (FRN 123456), occupying a responsible position in relation to the firm's compliance records, certify that this evidence pack — generated 2026-05-26T14:00:00.000Z UTC, with its SHA-256 tamper-detection hash recorded in the firm's CoverProof audit log at generation — forms part of the records of Acme Capital Partners Ltd, a business within the meaning of s.9(4) of the Civil Evidence Act 1995, compiled in the course of that business.

Signed: _____ Date: _____

This certificate is made by an officer of the firm under CEA 1995 s.9(2). It supports reception of this document as a business record in civil proceedings; it is not a determination of admissibility (a matter for the court on the facts) and is not a statement by CoverProof. For criminal proceedings, the reliability of this record is addressed by the reliability narrative (CJA 2003 s.117) in this pack.

Reliability of this record (Criminal Evidence — CJA 2003 s.117)

In criminal proceedings a business document may be admitted under CJA 2003 s.117; the court may decline to admit it (s.117(6)-(7)) where its reliability is doubtful, having regard to its contents and source. Following the scrutiny of computer-derived evidence after the Post Office Horizon proceedings, a firm should be able to evidence reliability. The controls below map to that inquiry:

- **Structured output:** verdicts and confidence are constrained to a fixed Zod schema — the record cannot drift outside the allowed values.
- **Determinism:** the production path runs at temperature 0 with a SHA-256 input-hash cache: identical input returns the identical output. (The local evaluation CLI has no temperature control — see the methodology statement §5.3.1.)
- **Documented source and circumstances:** every classification persists the system-prompt SHA-256, the raw model response, the model id, the methodology version, and a UTC timestamp — the contents and circumstances of creation are on record.
- **Mandatory human review:** a qualified compliance officer confirms, overrides, or excludes every verdict before inclusion; the officer's confirmation is the operative record and the AI output is evidence of the analytical basis, not the decision.
- **Traceable to statute:** factual claims are linked to verbatim s.250 text via the Citations API — the basis is traceable to source.
- **Quality controls:** confidence tiers are calibrated against observed accuracy and rationale faithfulness is scored against the source text; both are version-pinned and disclosed.

These controls support the reliability of this record under s.117; they do not guarantee its admissibility or the weight it is given — a court decides both on the facts.

METHODOLOGY APPENDIX

Pack ID: sample-pack-public-001

Generated: 2026-05-26T14:00:00.000Z

Methodology versions in scope

- s250-v12

fingerprint: aaaaaaaaaaaaaaaaaa...aaaaaaaa

model: claude-sonnet-4-6

Classification counts by methodology

- LLM path: 3
- Deterministic path: 0
- Total: 3

Chain-of-Verification (LLM rows only)

- Classifications verified: 2 of 3
- Downgraded due to unsupported claims: 1
- Verification failed (graceful degrade): 0

Citations

- Classifications with citations: 2 of 3
- Classifications with uncited claims flagged: 1

Evaluation accuracy (current snapshot)

- **Held-out set:** [PENDING — see Day 13 implementation status]
- **Triple-blind labelling:** [PENDING — see Day 13 implementation status]
- Multi-LLM consensus tier: SINGLE-FAMILY (Anthropic-only at v1; cross-family wired pending OpenAI/Gemini keys)

References

- Full methodology: docs/methodology-statement.md (commit public-sampl)
- Limitations and disclosures: §9 of methodology statement
- Founder adjudication log: none applicable for this pack

This pack's XMP metadata embeds the methodology fingerprints listed above, allowing verification that the prompts named here are those that produced these classifications. See pdf-a3b.ts and the XMP packet under the coverproof.uk/ns/methodology/1.0/ namespace for the full 64-char sha256 values matched against the truncated form rendered here.